## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

AARON GOINS et al.,	)	
Plaintiffs/Counter Defendants,	)	
v.	)	
	)	Civil Action No. 19-cv-489
	)	
TITLEMAX OF VIRGINIA, et al.,	)	
	)	
Defendants/Counter Claimants.	)	

# PLAINTIFFS' MOTION (SECOND SET OF PLAINTIFFS) TO COMPEL ARBITRATIONS AND STAY PROCEEDINGS

NOW COME PLAINTIFFS Linda Bradshaw, Marilyn Doss, Michael Jenkins, Marica Nelson, Kevin Smith, Cassandra Brooks, Robert Tillman, Dwayne Cockerham, Anthony Rosado, Lekitta Robinson, and Annette Ridgeway, through their counsel, and respectfully move the Court for an Order compelling arbitrations and staying the proceedings in this civil action. In support of their motion, Plaintiffs show unto the Court that Defendants' loan contracts with Plaintiffs that have given rise to Plaintiffs' claims against Defendants contain valid and enforceable arbitration agreements that cover each Plaintiff's claims against Defendants. Plaintiffs further show unto the Court that Defendants' Second Defense, Second, Third and Fourth Affirmative Defenses and all of Defendants' Counterclaims are also within the scope of the parties' arbitration agreements.

WHEREFORE, Plaintiffs respectfully move the Court for an Order compelling arbitrations and staying the proceedings against them in this civil action.

This is the 22nd day of January, 2020

/s/ Andrew H. Brown
Andrew H. Brown
N.C. State Bar No. 28450
Attorney for Plaintiffs

## FOR THE FIRM:

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# **CERTIFICATE OF SERVICE**

This is to certify that on January 22, 2020, a copy of the foregoing BRIEF IN SUP-PORT OF MOTION TO COMPEL ARBITRATIONS AND STAY PROCEEDINGS was filed with the Clerk of Court using CM/ECF system, which will send notification of such filing to the following:

Christopher W. Jones (<u>Chris.Jones@wbd-us.com</u>)
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